

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,  
ET AL.,

Defendants.

No. 12-cv-2039 (FAB)

**MOTION TO RESTRICT**

COMES NOW, Plaintiff, the United States of America, and respectfully moves to restrict its Response to the Commonwealth's Motions Submitting Its Training Plan, ECF No. 2344, for viewing by selected case participants, in accordance with Standing Order No. 9, *Amendment to the Restricted Filing and Viewing Levels Module*, Misc. No. 03-149 (Jan. 30, 2013). For cause, the United States alleges, states, and prays:

1. On March 10, 2023, Defendants moved this Court for an order to restrict their Motion Submitting Preliminary Training Plan, ECF No. 2324, for viewing by selected case participants. Defs.' Mot. to Restrict, ECF No. 2325. The Court granted Defendants' Motion to Restrict on March 13, 2023. Order, ECF No. 2328.

2. The United States seeks to restrict its Motion in Compliance because it pertains to matters that are restricted presently by the Court's Order of March 13, 2023.

WHEREFORE, the United States respectfully requests that the Court grant this request and restrict the United States' Response to the Commonwealth's Motions Submitting Its Training Plan, ECF No. 2344.

Respectfully submitted, this 29th day of March, 2023,

STEVEN H. ROSENBAUM  
Chief, Special Litigation Section  
Civil Rights Division

/s/Katherine Chamblee-Ryan  
TIMOTHY D. MYGATT  
Deputy Chief  
LUIS E. SAUCEDO (G01613)  
JORGE CASTILLO (G02912)  
KATHERINE CHAMBLEE-RYAN (G03515)  
Trial Attorneys  
Civil Rights Division  
Special Litigation Section  
Four Constitution Square  
150 M Street NE  
Washington, D.C. 200002  
Telephone: (202) 598-0538  
luis.e.saucedo@usdoj.gov  
jorge.castillo@usdoj.gov  
katherine.chamblee-ryan@usdoj.gov

Attorneys for Plaintiff